



Valdi Licul

vlicul@wigdorlaw.com

May 23, 2024

VIA ECF

The Honorable Victoria Reznik
Federal Building and United States Courthouse
300 Quarropas St., Room 420
White Plains, NY 10601-4150

Re: Natalie Grainger v. Westchester Country Club, Inc., et al.;
Case No. 7:23-cv-01802 (CS)(VR)

Dear Judge Reznik,

Pursuant to Your Honor's Order directing Plaintiff to file the Requests for Admission that form the basis for Plaintiff's letter motion for a protective order, Dkt. Nos. 66 and 68, please find enclosed the Requests for Admissions served by Defendants Westchester Country Club, Inc., Mark Christiana and Tom Nevin.

We thank the Court for its time and attention.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Valdi Licul", with a long horizontal stroke extending to the right.

Valdi Licul

Encl.

Cc: All Counsel of Record (*via* ECF)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NATALIE GRAINGER,

Plaintiffs,

v.

WESTCHESTER COUNTRY CLUB, INC.,
MARK CHRISTIANA, and TOM NEVIN,

Defendants.

Case No.: 7:23-CV-01802(CS)

**DEFENDANTS’
REQUEST FOR ADMISSIONS TO
PLAINTIFF NATALIE GRAINGER**

PLEASE TAKE NOTICE that defendants Westchester Country Club, Inc. (“WCC”), Mark Christiana (“Christiana”), and Tom Nevin (“Nevin”) (collectively, “Defendants”), by and through their attorneys, Gordon Rees Scully Mansukhani, LLP, hereby request that plaintiff Natalie Grainger (“Plaintiff” or “Grainger”) responds to the following Requests for Admissions in the manner prescribed by Rule 36 of the Federal Rules of Civil Procedure. Responses to these Requests must be served within thirty (30) days after service of these requests.

DEFINITIONS

1. The definitions set forth in Local Civil Rule 26.3 are hereby deemed incorporated by reference into these document requests.
2. “You,” “your,” “Plaintiff,” and/or “Grainger” refer to Plaintiff Natalie Grainger or any agent who has acted or is acting on her behalf.
3. “WCC” refers to defendant Westchester Country Club, Inc., or any agent who has acted or is acting on its behalf.
4. “Christiana” refers to defendant Mark Christiana.
5. “Nevin” refers to defendant Tom Nevin.
6. “Defendants” refers collectively to WCC, Christiana, and Nevin.

7. “Complaint” refers to the Complaint in this matter, filed on March 2, 2023.

8. Where a pseudonym is used to identify an individual, such pseudonym refers to the same individual to whom you have referred in the Complaint as that pseudonym. As an example, “Board Member 1” refers to the individual called “Board Member 1” in the Complaint.

9. “Person” means any and all natural persons, firms, corporations, trusts, businesses, or entities, including all members, officers, directors, employees, agents, representatives, attorneys, successors, predecessors, assigns, divisions, affiliates and subsidiaries.

10. “Relevant Time Period” refers to the time period beginning at the commencement of Plaintiff’s employment with WCC and continuing through the present, unless otherwise specified.

11. “All documents” means each and every document, as defined by Local Civil Rule 26.3, that can be located, discovered or obtained by reasonable diligent efforts, including without limitation all documents possessed by you or your counsel, and any other person from whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand.

12. “Employment or affiliation” means any relationship, either directly or indirectly, on your own behalf or in the service or on behalf of others, as a consultant, technical, management, supervisory, executive, or other employee of any individual, company, partnership, or business concern or entity, or as an independent contractor for any individual, company partnership, or business concern or entity.

INSTRUCTIONS

1. You are instructed to provide a written answer or objection to each Request for Admission (“RFA”) below. If an objection is made, the reasons therefore shall be stated. The answer shall specifically admit or deny the matter or set forth in detail the reasons why you cannot

truthfully admit or deny the matter. An answer shall fairly meet the substance of the required admission, and when good faith requires that you qualify your answer or deny only a part of the matter on which an admission is requested, you shall admit so much of the RFA as is true and qualify or deny the remainder.

2. You may not give lack of information or knowledge as a reason for failure to admit or deny unless you state that you have made reasonable inquiry and that the information known to you or readily obtainable by you is insufficient to enable you to admit or deny.

3. If you consider that a matter of which an admission has been requested presents a genuine issue for trial, you may not, on that ground alone, object to the request, you may admit or deny the matter or set forth reasons why you cannot admit or deny it.

4. Any RFA that is not responded to within 30 days of service of this request will be deemed admitted.

5. Whenever a RFA is stated in the singular, it shall also be taken in the plural, and vice versa.

6. This is a continuing request for admissions. If after making your initial production you obtain or become aware of any further information responsive to this request, you are required to provide supplemental responses.

REQUEST FOR ADMISSIONS

1. When you submitted your application to WCC, you had no concerns about working at WCC.
2. Patricia Valenti was a member of WCC's Board of Governors in 1989.
3. Patricia Valenti was the Vice President of the Board of Governors at WCC between 2017 and 2022.
4. Patricia Valenti was a chair of WCC's Board of Governors.
5. You have an affiliation with the Apawamis Club through your husband.
6. You had an affiliation with the Apawamis Club through your husband during your employment at WCC.
7. You have an affiliation with Seminole Golf Club through your husband.
8. You had an affiliation with Seminole Golf Club through your husband during your employment at WCC.
9. You have an affiliation with Lost Tree Club through your husband.
10. You had an affiliation with Lost Tree Club through your husband during your employment at WCC.
11. You have an affiliation with Century Country Club through your husband.
12. You had an affiliation with Century Country Club through your husband during your employment at WCC.
13. The offer letter you received from WCC sets forth your duties and responsibilities including your reporting relationships.
14. You were required to disclose your concerns about the alleged drugging of Elani Landman in March 2020 to Tom Nevin.

15. You did not disclose your concerns about the alleged monetary payment made by Arthur Schwabe to Elani Landman to anyone at WCC.

16. There were instances when Elani Landman was paid for coaching services through T-Position, LLC.

17. You have no factual basis to establish that Andrea Echeverria had an inappropriate relationship with WCC members on WCC property.

18. Your belief that Andrea Echeverria slept with Arthur Schwabe is based upon rumors.

19. You took days off without logging them in SyncHR during your employment at WCC.

20. You were not at work at WCC on August 2, 2019. *See* LANDMAN_000002.

21. You were supposed to be at work at WCC on August 2, 2019, but were “exhausted” and “stressed” so did not come in. *See* LANDMAN_000002.

22. You were not at work at WCC on August 3, 2019. *See* LANDMAN_000004.

23. You were in Southampton having a “wonderful day” on August 3, 2019. *See* LANDMAN_000004.

24. You played golf at National on August 3, 2019. *See* LANDMAN_000005.

25. You were not at work at WCC on August 4, 2019. *See* LANDMAN_000005.

26. You were playing golf on August 4, 2019. *See* LANDMAN_000005.

27. You were not at work at WCC until after 3:00pm on August 5, 2019. *See* LANDMAN_000006.

28. You were playing in a member-guest tournament at Shinnecock on August 5, 2019. *See* LANDMAN_000004.

29. You were supposed to be back at WCC at 3:00pm on August 5, 2019 to coach the “elite training” group. *See* LANDMAN_000004.

30. At 2:53pm on August 5, 2019, you were still on the road driving back from Shinnecock after playing in the member-guest tournament. *See* LANDMAN_000006.

31. You were not at work at WCC on August 7, 2019. *See* LANDMAN_000008.

32. You were not at work at WCC on August 8, 2019. *See* LANDMAN_000009.

33. You were not at work at WCC on September 4, 2019. *See* LANDMAN_000010.

34. On September 4, 2019 you were a spectator at the US Open tennis matches. *See* LANDMAN_000010.

35. You left work at WCC early on September 5, 2019. *See* LANDMAN_000011.

36. You were a spectator at the US Open tennis matches on the evening of September 5, 2019. *See* LANDMAN_000011.

37. Assistant Squash Professional Clive Leach asked to take the day off on September 5, 2019 to be a spectator at the US Open tennis matches, but you told him he needed to go coach at WCC because you would be absent due to your attendance at the US Open tennis matches. *See* LANDMAN_000011.

38. You were left work at WCC after a budget meeting on September 26, 2019. *See* LANDMAN_000012.

39. The WCC squash professional schedule indicates that you coached the ladies’ clinic at WCC on September 26, 2019. *See* LANDMAN_001574.

40. Instead of working as scheduled on September 26, 2019, you were in the “middle of nowhere.” *See* LANDMAN_000012.

41. On September 26, 2019, you checked with Assistant Squash Professional Elani Landman to see how the day at WCC went because you were not there. *See* LANDMAN_000012.

42. You were not at work at WCC on September 27, 2019. *See* LANDMAN_000013.

43. You were not at work at WCC on September 28, 2019. *See* LANDMAN_000014-LANDMAN_000016.

44. You were going to go to WCC to work on the afternoon of September 28, 2019, but you ultimately did not do so. *See* LANDMAN_000014-LANDMAN_000016.

45. You were scheduled to coach the elite training session the evening of October 17, 2019. *See* LANDMAN_001574.

46. You did not coach the elite training session the evening of October 17, 2019. *See* LANDMAN_000017.

47. You were not at work at WCC on November 15, 2019. *See* LANDMAN_000021.

48. You were in Florida at Lost Tree Club on November 15, 2019. *See* LANDMAN_000021; Lost Tree Documents at 2.

49. You were not at work at WCC on November 16, 2019. *See* SEMINOLE00000001.

50. You were playing golf at Seminole Golf Club on November 16, 2019. *See* SEMINOLE00000001.

51. You were not at work at WCC on November 17, 2019. *See* LANDMAN_000022.

52. You were not at work at WCC until the afternoon of November 18, 2019. *See* LANDMAN_000022.

53. You flew to Florida on December 17, 2019. *See* LANDMAN_000023.

54. You were not at work at WCC on December 21, 2019. *See* SEMINOLE00000001.

55. You were playing golf at Seminole Golf Club on December 21, 2019. *See* SEMINOLE000000001.

56. You were not at work at WCC on December 29, 2019. *See* LANDMAN_000024.

57. You were not at work at WCC on December 30, 2019. *See* Lost Tree Documents at 2.

58. You were at Lost Tree Club on December 30, 2019. *See* Lost Tree Documents at 2.

59. You were not at work at WCC on January 3, 2020. *See* LANDMAN_000025.

60. You were not at work at WCC on January 4, 2020. *See* SEMINOLE000000001.

61. You were playing golf at Seminole Golf Club on January 4, 2020. *See* SEMINOLE000000001.

62. You were not at work at WCC on January 15, 2020. *See* LANDMAN_000027.

63. You asked Alan Clyne, a squash professional who was not employed by WCC, to provide coaching coverage on January 15, 2020. *See* LANDMAN_000027.

64. You were not at work at WCC on January 16, 2020. *See* LANDMAN_000027.

65. You asked Alan Clyne, a squash professional who was not employed by WCC, to provide coaching coverage on January 16, 2020. *See* LANDMAN_000027.

66. You asked Olivia “Liv” Clyne, a squash professional who was not employed by WCC, to provide coaching coverage on January 16, 2020. *See* LANDMAN_000029.

67. You were playing golf at Seminole Golf Club on January 16, 2020. *See* SEMINOLE000000001.

68. You were not at work at WCC on January 18, 2020. *See* LANDMAN_000030.

69. You were playing in the Century Country Club doubles tournament on January 18, 2020. *See* LANDMAN_000030.

70. You were not at work at WCC on January 20, 2020. *See* LANDMAN_000032.
71. You did not arrive to work at WCC until between approximately 12:30-1:00pm on January 21, 2020. *See* LANDMAN_000034.
72. You were not at work at WCC on February 5, 2020. *See* LANDMAN_000035.
73. You were traveling to Florida to compete in the Seminole Golf Club Ladies' Invitational on February 5, 2020. *See* LANDMAN_000035.
74. You asked Olivia "Liv" Clyne, a squash professional who was not employed by WCC, to provide coaching coverage on February 5, 2020. *See* LANDMAN_000035.
75. You were not at work at WCC on February 6, 2020. *See* LANDMAN_000035.
76. You were in Florida competing in the Seminole Golf Club Ladies' Invitational on February 6, 2020. *See* LANDMAN_000035; SEMINOLE00000001.
77. You were not at work at WCC on February 7, 2020. *See* LANDMAN_000040.
78. You were in Florida on February 7, 2020. *See* LANDMAN_000040.
79. You were playing golf at Seminole Golf Club on February 7, 2020. *See* SEMINOLE00000001.
80. You traveled back from Florida on February 8, 2020. *See* LANDMAN_000042.
81. You left work work at WCC on the afternoon of February 9, 2020. *See* LANDMAN_000044.
82. You were not at work at WCC on February 10, 2020. *See* LANDMAN_000045.
83. You asked Olivia "Liv" Clyne, a squash professional who was not employed by WCC, to provide coaching coverage on February 10, 2020. *See* LANDMAN_000045.
84. You were at Lost Tree Club receiving a spa service on February 10, 2020. *See* Lost Tree Documents at 2.

85. You were not at work at WCC on February 11, 2020. *See* LANDMAN_000046.
86. You asked Olivia “Liv” Clyne, a squash professional who was not employed by WCC, to provide coaching coverage on February 11, 2020. *See* LANDMAN_000046.
87. You asked Erin, a junior squash player and WCC member who was not employed by WCC, to provide coaching coverage on February 11, 2020. *See* LANDMAN_000046.
88. You were playing golf at Seminole Golf Club on February 11, 2020. *See* SEMINOLE000000001.
89. You were not at work at WCC on February 16, 2020. *See* Lost Tree Documents at 2.
90. You were at Lost Tree Club receiving a spa service on February 16, 2020. *See* Lost Tree Documents at 2.
91. You were not at work at WCC on February 17, 2020. *See* LANDMAN_000048.
92. You were playing golf at Seminole Golf Club on February 17, 2020. *See* SEMINOLE000000001.
93. You traveled back from Florida on February 18, 2020. *See* LANDMAN_000048.
94. You left work at WCC on the afternoon of February 21, 2020. *See* LANDMAN_000049.
95. You were not at work at WCC on February 22, 2020. *See* LANDMAN_000050.
96. You were not at work at WCC on February 23, 2020. *See* LANDMAN_000051.
97. You played golf at Seminole Golf Club on February 23, 2020. *See* LANDMAN_000051; SEMINOLE000000001.
98. You were not at work at WCC on February 29, 2020. *See* LANDMAN_000052; SEMINOLE000000001.

99. You asked Elani Landman to cover a lesson for you on February 29, 2020. *See* LANDMAN_000052.

100. You were playing golf at Seminole Golf Club on February 29, 2020. *See* SEMINOLE000000001.

101. You were not at work at WCC until after 2:00pm on March 2, 2020. *See* LANDMAN_000054.

102. You were not at work at WCC on March 5, 2020. *See* Lost Tree Documents at 2.

103. You were at Lost Tree Club receiving a spa service on March 5, 2020. *See* Lost Tree Documents at 2.

104. You were not at work at WCC on March 6, 2020. *See* Lost Tree Documents at 2.

105. You were at the beach house at Lost Tree Club on March 6, 2020. *See* Lost Tree Documents at 2.

106. On July 14, 2020, July 15, 2020, and July 16, 2020, you asked Patrick Keller, a youth squash player and WCC member who was not a WCC employee, to provide coaching coverage for a youth sports camp. *See* LANDMAN_000064-000065.

107. You were not at work at WCC on July 29, 2020. *See* LANDMAN_000066.

108. Your schedule indicates that you helped coach the elite squash clinic on August 7, 2020. *See* LANDMAN_001575.

109. Elani Landman taught the clinic on August 7, 2020. *See* LANDMAN_000067.

110. You were not at work at WCC on August 12, 2020. *See* LANDMAN_000069.

111. You were playing in the WCC Member-Guest golf tournament on August 12, 2020. *See* LANDMAN_000069.

112. You were not at work at WCC on August 18, 2020. *See* LANDMAN_000070.

113. You were not at work at WCC on August 19, 2020. *See* LANDMAN_000071.
114. You were not at work at WCC on August 20, 2020. *See* LANDMAN_000072.
115. You were playing golf on August 20, 2020. *See* LANDMAN_000073.
116. You were not at work at WCC until at or around 4:00pm on August 21, 2020. *See* LANDMAN_000074.
117. You were not at work at WCC on October 12, 2020. *See* LANDMAN_000077.
118. You were caddying for the Century Country Club golf pro at the Apawamis Club for the Met Open on October 12, 2020. *See* LANDMAN_000077.
119. You were not at work at WCC on October 13, 2020. *See* LANDMAN_000078.
120. You were not at work at WCC on November 6, 2020. *See* SEMINOLE00000001.
121. You were playing golf at Seminole Golf Club on November 6, 2020. *See* SEMINOLE00000001.
122. You were not at work at WCC on November 15, 2020. *See* SEMINOLE00000001.
123. You were playing golf at Seminole Golf Club on November 15, 2020. *See* SEMINOLE00000001.
124. You got takeout food at Lost Tree Club on November 15, 2020. *See* Lost Tree Documents at 3.
125. You were not at work at WCC on January 14, 2021. *See* SEMINOLE00000001.
126. You were playing golf at Seminole Golf Club on January 14, 2021. *See* SEMINOLE00000001.
127. You were not at work at WCC at January 15, 2021. *See* SEMINOLE00000001.
128. You were playing golf at Seminole Golf Club on January 15, 2021. *See* SEMINOLE00000001.

129. You were not at work at WCC on January 20, 2021. *See* SEMINOLE00000001.
130. You were playing golf at Seminole Golf Club on January 20, 2021. *See* SEMINOLE00000001.
131. You were not at work at WCC on January 21, 2021. *See* SEMINOLE00000001.
132. You were playing golf at Seminole Golf Club on January 21, 2021. *See* SEMINOLE00000001.
133. You were not at work at WCC on January 22, 2021. *See* SEMINOLE00000001.
134. You were playing golf at Seminole Golf Club on January 22, 2021. *See* SEMINOLE00000001.
135. You were not at work at WCC on January 27, 2021. *See* LANDMAN_000090.
136. You were not at work at WCC until after 1:30pm on February 3, 2021. *See* LANDMAN_000094.
137. You were not at work at WCC on February 11, 2021. *See* LANDMAN_000095.
138. You were playing golf at Seminole Golf Club with WCC member Bryan Fitzpatrick on February 11, 2021. *See* LANDMAN_000095; SEMINOLE00000001.
139. You were not at work at WCC on February 12, 2021. *See* SEMINOLE00000001.
140. You were playing golf at Seminole Golf Club on February 12, 2021. *See* SEMINOLE00000001.
141. You were not at work at WCC on February 13, 2021. *See* Lost Tree Documents at 3.
142. You were eating at the Clubhouse at Lost Tree Club on February 13, 2021. *See* Lost Tree Documents at 3.
143. You were not at work at WCC on February 19, 2021. *See* LANDMAN_000101.

144. You were playing golf at Seminole Golf Club on February 19, 2021. *See* LANDMAN_000101; SEMINOLE000000001.

145. You were not at work at WCC on February 20, 2021. *See* SEMINOLE000000001.

146. You were playing golf at Seminole Golf Club on February 20, 2021. *See* SEMINOLE000000001.

147. You were not at work at WCC on February 26, 2021. *See* SEMINOLE000000001.

148. You were playing golf at Seminole Golf Club on February 26, 2021. *See* SEMINOLE000000001.

149. You were not at work at WCC on February 27, 2021. *See* Lost Tree Documents at 3.

150. You were at Lost Tree Club on February 27, 2021. *See* Lost Tree Documents at 3.

151. You did not work a full day at WCC on March 4, 2021. *See* LANDMAN_000102.

152. You were not at work at WCC on March 5, 2021. *See* Lost Tree Documents at 3.

153. You were at the “Pelicans Nest” at Lost Tree Club on March 5, 2021. *See* Lost Tree Documents at 3.

154. You were not at work at WCC on March 6, 2021. *See* LANDMAN_000103; Lost Tree Documents at 3.

155. You were playing in the Lost Tree Club Championship on March 6, 2021. *See* LANDMAN_000103.

156. You were not at work at WCC on March 7, 2021. *See* LANDMAN_000103; Lost Tree Documents at 3.

157. You were playing in the Lost Tree Club Championship finals on March 7, 2021. *See* LANDMAN_000103-000104.

158. You were not at work at WCC on March 16, 2021. *See* LANDMAN_000105.
159. You were traveling on March 16, 2021. *See* LANDMAN_000105.
160. You were not at work at WCC on March 17, 2021. *See* LANDMAN_000106.
161. You were at Lost Tree Club receiving a spa service on March 17, 2021. *See* Lost Tree Documents at 3.
162. You were not at work at WCC on March 18, 2021. *See* LANDMAN_000107.
163. You were shopping for golf merchandise at Lost Tree Club on March 18, 2021. *See* Lost Tree Documents at 3.
164. You booked a flight to come back to New York the late afternoon of March 19, 2021. *See* LANDMAN_000108.
165. You were not at work at WCC on March 23, 2021. *See* Lost Tree Documents at 3.
166. You were at the Beach House at Lost Tree Club on March 23, 2021. *See* Lost Tree Documents at 3.
167. You were not at work at WCC on March 24, 2021. *See* SEMINOLE000000001.
168. You were playing golf at Seminole Golf Club on March 24, 2021. *See* SEMINOLE000000001.
169. You were not at work at WCC on March 25, 2021. *See* SEMINOLE000000001.
170. You were playing golf at Seminole Golf Club on March 25, 2021. *See* SEMINOLE000000001.
171. You were not at work at WCC on March 26, 2021. *See* SEMINOLE000000001.
172. You were playing golf at Seminole Golf Club on March 26, 2021. *See* SEMINOLE000000001.
173. You were not at work on April 8, 2021. *See* LANDMAN_000109.

174. You were “heading south for a few days” on April 8, 2021. *See* LANDMAN_000109.

175. You played golf with WCC member Artie Schwabe on April 9, 2021. *See* LANDMAN_000110.

176. You were not at work at WCC on April 10, 2021. *See* SEMINOLE000000001.

177. You were playing golf at Seminole Golf Club on April 10, 2021. *See* SEMINOLE000000001.

178. You got takeout food at Lost Tree Club on April 10, 2021. *See* Lost Tree Documents at 3.

179. You were not at work at WCC for the afternoon of April 22, 2021. *See* LANDMAN_000113.

180. You were not at work at WCC on April 23, 2021. *See* Lost Tree Documents at 3.

181. You were receiving a spa service at Lost Tree Club on April 23, 2021. *See* Lost Tree Documents at 3.

182. You were not at work at WCC on April 24, 2021. *See* SEMINOLE000000001.

183. You were playing golf at Seminole Golf Club on April 24, 2021. *See* SEMINOLE000000001.

184. You were not at work at WCC on April 25, 2021. *See* Lost Tree Documents at 3.

185. You were at the “Pelicans Nest” and playing golf at Lost Tree Club on April 25, 2021. *See* Lost Tree Documents at 3.

186. You were not at work at WCC on May 8, 2021. *See* Lost Tree Documents at 3.

187. You were taking tennis lessons at Lost Tree Club on May 8, 2021. *See* Lost Tree Documents at 3.

188. You were not at work at WCC on May 9, 2021. *See* Lost Tree Documents at 3.
189. You were taking tennis lessons at Lost Tree Club on May 9, 2021. *See* Lost Tree Documents at 3.
190. You were on a flight during the day on May 10, 2021. *See* LANDMAN_000114.
191. You were not at work at WCC on May 28, 2021. *See* Lost Tree Documents at 3.
192. You were receiving a spa service at Lost Tree Club on May 28, 2021. *See* Lost Tree Documents at 3.
193. You were not at work at WCC on May 29, 2021. *See* SEMINOLE000000001.
194. You were playing golf at Seminole Golf Club on May 29, 2021. *See* SEMINOLE000000001.
195. You were not at work at WCC on May 30, 2021. *See* SEMINOLE000000001.
196. You were playing golf at Seminole Golf Club on May 30, 2021. *See* SEMINOLE000000001.
197. You were not at work at WCC on June 3, 2021. *See* LANDMAN_000121.
198. You were playing golf on June 3, 2021. *See* LANDMAN_000121.
199. You were not at work at WCC on June 4, 2021. *See* LANDMAN_000121.
200. You were playing golf on June 4, 2021. *See* LANDMAN_000121.
201. You required coaching coverage for lessons the weekend of June 5, 2021. *See* LANDMAN_000121.
202. You were playing golf on June 5, 2021. *See* LANDMAN_000122-000123.
203. You were not at work at WCC on June 9, 2021. *See* LANDMAN_000125.
204. You were late to a scheduled lesson at WCC on June 22, 2021 because you were playing tennis. *See* LANDMAN_000126.

205. You were not at work at WCC on June 27, 2021. *See* LANDMAN_000127.
206. You were playing the Mixed Club Championships at the Apawamis Club on June 27, 2021. *See* LANDMAN_000127.
207. You were not at work at WCC on June 28, 2021. *See* LANDMAN_000128.
208. You were playing in a golf competition on June 28, 2021. *See* LANDMAN_000128.
209. You were not at work at WCC on July 5, 2021. *See* LANDMAN_000130.
210. You were playing golf on July 5, 2021. *See* LANDMAN_000130.
211. You did not arrive to work at WCC until the afternoon of July 6, 2021. *See* LANDMAN_000131.
212. You were playing golf on July 6, 2021. *See* LANDMAN_000131.
213. You were not at work on August 12, 2021. *See* LANDMAN_000132.
214. You were playing in a competition on August 12, 2021. *See* LANDMAN_000132.
215. You were not at work at WCC on August 19, 2021. *See* LANDMAN_000133.
216. You were not at work at WCC on September 6, 2021. *See* LANDMAN_000134.
217. You were playing in the Apawamis Club Championship on September 6, 2021. *See* LANDMAN_000134.
218. WCC member Patrick Schwarz asked to have a lesson with you on September 6, 2021, but you were not available due to your absence. *See* LANDMAN_000134.
219. You were not at work at WCC on September 19, 2021. *See* LANDMAN_000135.
220. You were playing golf on September 19, 2021. *See* LANDMAN_000135.
221. You were not at work at WCC on October 30, 2021. *See* SEMINOLE000000001.

222. You were playing golf at Seminole Golf Club on October 30, 2021. *See* SEMINOLE000000001.

223. You were not at work at WCC on December 18, 2021. *See* SEMINOLE000000001.

224. You were playing golf at Seminole Golf Club on December 18, 2021. *See* SEMINOLE000000001.

225. You were not at work at WCC on December 20, 2021. *See* SEMINOLE000000001.

226. You were playing golf at Seminole Golf Club on December 20, 2021. *See* SEMINOLE000000001.

227. You were not at work at WCC on December 22, 2021. *See* SEMINOLE000000001.

228. You were playing golf at Seminole Golf Club on December 22, 2021. *See* SEMINOLE000000001.

229. You were not at work at WCC on December 31, 2021. *See* SEMINOLE000000001.

230. You were playing golf at Seminole Golf Club on December 31, 2021. *See* SEMINOLE000000001.

231. You were not at work at WCC on January 2, 2022. *See* SEMINOLE000000001.

232. You were playing golf at Seminole Golf Club on January 2, 2022. *See* SEMINOLE000000001.

233. You were not at work at WCC on January 6, 2022. *See* SEMINOLE000000002.

234. You were playing golf at Seminole Golf Club on January 6, 2022. *See* SEMINOLE000000002.

235. You were not at work at WCC on January 19, 2022. *See* Lost Tree Documents at 3.

236. You were at the Beach House at Lost Tree Club on January 19, 2022. *See* Lost Tree Documents at 3.

237. You were not at work at WCC on January 20, 2022. *See* SEMINOLE000000002.

238. You were playing golf at Seminole Golf Club on January 20, 2022. *See* SEMINOLE000000002.

239. You were not at work at WCC on February 1, 2022. *See* SEMINOLE000000002.

240. You were playing golf at Seminole Golf Club on February 1, 2022. *See* SEMINOLE000000002.

241. You were not at work at WCC on February 2, 2022. *See* SEMINOLE000000002.

242. You were playing golf at Seminole Golf Club on February 2, 2022. *See* SEMINOLE000000002.

243. You were not at work at WCC on February 3, 2022. *See* SEMINOLE000000002.

244. You were playing golf at Seminole Golf Club on February 3, 2022. *See* SEMINOLE000000002.

245. You were not at work at WCC on February 4, 2022. *See* SEMINOLE000000002.

246. You were playing golf at Seminole Golf Club on February 4, 2022. *See* SEMINOLE000000002.

247. You were not at work at WCC on February 10, 2022. *See* SEMINOLE000000002.

248. You were playing golf at Seminole Golf Club on February 10, 2022. *See* SEMINOLE000000002.

249. You were not at work at WCC on March 1, 2022. *See* Lost Tree Documents at 3.

250. You were at the Beach House at Lost Tree Club on March 1, 2022. *See* Lost Tree Documents at 3.

251. You were not at work at WCC on March 2, 2022. *See* Lost Tree Documents at 3.

252. You were purchasing golf merchandise at Lost Tree Club on March 2, 2022. *See* Lost Tree Documents at 3.

253. You were not at work at WCC on March 11, 2022. *See* Lost Tree Documents at 3.

254. You were receiving spa services at Lost Tree Club on March 11, 2022. *See* Lost Tree Documents at 3.

255. You were not at work at WCC on March 12, 2022. *See* Lost Tree Documents at 4.

256. You were receiving a spa service at Lost Tree Club on March 12, 2022. *See* Lost Tree Documents at 4.

PLEASE TAKE NOTICE that Defendants hereby reserve their right to supplement this request as may be necessary during the course of discovery or otherwise.

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Dated: New York, New York
March 29, 2024

Respectfully Submitted,

GORDON REES SCULLY
MANSUKHANI, LLP

By: /s/ John Mills
Mercedes Colwin, Esq.
John T. Mills, Esq.
Hannah Kucine, Esq.
One Battery Park Plaza, 28th Floor
New York, NY 10004
(212) 269-5500
Attorneys for Defendants

To: **VIA ELECTRONIC MAIL**
Valdi Licul, Esq.
Kassandra Vazquez, Esq.
WIGDOR LLP
85 Fifth Avenue
New York, NY 10003
vlicul@wigdorlaw.com
kvazquez@wigdorlaw.com *Attorneys for Plaintiff Natalie Grainger*

DECLARATION

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalties of perjury under the laws of the United States of America that the foregoing answers to the Request for Admissions are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

I hereby further declare that the copies of any document annexed hereto, as requested in the Request for Admissions are exact copies of the entire document in my possession. I hereby also further declare that the copies of any reports annexed hereto rendered by any individual, including but not limited to proposed expert witnesses, expert witnesses who are not expected to testify at trial, and expert witness who are expected to testify at trial are exact copies of the entire report or reports rendered by them (in draft and final form), and that the existence of other reports of said individuals, written or oral are unknown to me and if such become later known or available, I shall promptly serve them on the propounding party.

NATALIE GRAINGER

Dated: _____